

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Application of

DELTA AIR LINES, INC.

**for a frequency allocation to operate
Atlanta, Georgia-Cape Town,
South Africa service**

Docket DOT-OST-2022-0050

**RESPONSE OF THE DELTA MASTER EXECUTIVE COUNCIL
OF THE AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

Jason Ambrosi, Chairman Delta
Master Executive Council
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May 25, 2022

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Applications of

**DELTA AIR LINES, INC.
UNITED AIRLINES, INC.**

**for allocation of U.S.-South Africa
frequencies**

Docket DOT-OST-2022-0050

**RESPONSE OF THE DELTA MASTER EXECUTIVE COUNCIL
OF THE AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

On behalf of the more than 13,000 pilots who fly for Delta Air Lines,¹ the Air Line Pilots Association, International's Delta Master Executive Council (MEC) respectfully files this response in support of Delta's amended and supplemented application for three weekly frequencies to inaugurate non-stop Atlanta-Cape Town service.

Delta's proposal best serves the Department's objective of maximizing public benefits, Order 2022-5-1 at 3, because it will offer and maintain the best service for the traveling and shipping public and will most effectively enhance competition in the U.S.-South America market. United already holds ten (10) U.S.-South Africa slots while Delta has seven (7). Granting Delta's request for three (3) frequencies would result in an equal, fair allocation of frequencies between the two carriers. In contrast, United's proposal would result in a nearly 2:1 structural advantage over Delta between U.S. and South Africa (13x/week vs. 7x/week).

Moreover, United currently holds a monopoly on nonstop U.S.-Cape Town service with

¹ Common names are used for airlines.

3x weekly service from Newark, New Jersey. Granting Delta's request for 3x weekly nonstop service between Atlanta and Cape Town would create true competition in the U.S.-Cape Town market, benefiting passengers and shippers alike. Denying Delta's request would, in contrast, cement United's monopoly indefinitely. Moreover, even United's "compromise" proposal of splitting the four available frequencies equally between Delta and United would result in a marked structural advantage for United in the U.S.-Cape Town market (5 weekly frequencies vs. 2 weekly frequencies). That hardly serves the Department's objective of maximizing public benefits or competition.

Finally, Delta's proposed service offering utilizes the airline's largest aircraft: the A350-900. That benefits the traveling public by offering significantly more seats with each flight than would United's proposal, with the potential to serve over 15,000 more passengers each year. For Delta pilots, the opportunity to fly the A350-900 represents the pinnacle of an experienced pilot's career. Delta's commitment to use these aircraft in nonstop service to Cape Town therefore makes this important career opportunity available to more pilots at the airline, and in turn encourages more prospective pilots to enter the profession.

For all the reasons above, the Delta MEC strongly supports Delta's amended application and urges the Department to grant Delta's request in its entirety.

Respectfully submitted,



Jason Ambrosi, Chairman
Delta Master Executive
Council

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CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2022, the foregoing document was served on the following persons via the email addresses listed below in accordance with the Department's Rules of Practice:

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